

**EXHIBIT 15**

**FILED UNDER SEAL**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

No. 3:17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;

OTTOMOTTO LLC; OTTO TRUCKING,

INC.,

Defendants.

12 \_\_\_\_\_

WAYMO & UBER CONFIDENTIAL ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF GREGORY KINTZ

SAN FRANCISCO, CALIFORNIA

WEDNESDAY, APRIL 26, 2017

WEDNESDAY, APRIL 26, 2017

WEDNESDAY, APRIL 26, 2017

BY: ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR ~

CSR LICENSE NO. 9830

JOB NO. 2592507

25 PAGES 1 - 234

1 [REDACTED] [REDACTED]  
2 [REDACTED] 15:11  
3 Do you see that? 15:11  
4 A I do see that. 15:11  
5 Q So would you agree that Schultz discloses 15:11  
6 that [REDACTED] [REDACTED]  
7 [REDACTED] 15:11  
8 MR. JAFFE: Objection; form. 15:11  
9 THE WITNESS: The device in question here in 15:11  
10 this Ph.D. thesis from a student in Germany refers to 15:11  
11 a high-powered laser diode bar with multiple emitters 15:11  
12 where the bar is bonded to a heat sink. There is 15:11  
13 another contact bar on top of the device. 15:11  
14 And this has little or no relationship to a 15:11  
15 [REDACTED] 15:12  
16 MR. KIM: So that wasn't responsive to my 15:12  
17 question. Let me ask you a different one. 15:12  
18 Q On page 63 -- can you turn to page 63. 15:12  
19 A (Witness complies.) 15:12  
20 Q Do you see Figure 4-10? 15:12  
21 A I do. 15:12  
22 Q Where it's labeled: 15:12  
23 [REDACTED] [REDACTED]  
24 [REDACTED] 15:12  
25 Do you see that? 15:12

1 A Yes. 15:12

2 Q And above that label, [REDACTED] [REDACTED]  
[REDACTED] [REDACTED] 15:13

5 Do you see that? 15:13

6 A Yes. 15:13

7 Q Okay. This depicts [REDACTED] [REDACTED]  
[REDACTED]; correct? 15:13

9 A Again, [REDACTED] [REDACTED]  
[REDACTED] [REDACTED] 15:13

12 [REDACTED] [REDACTED] 15:13

15 Q That's not my question. 15:13

16 My question is: That figure depicts [REDACTED] [REDACTED]  
[REDACTED] [REDACTED] 15:13

19 MR. JAFFE: Objection; form. 15:13

20 THE WITNESS: As you see in this figure, 15:13

21 there is [REDACTED] 15:13

22 But the greater body of knowledge of the 15:13

23 packaging of even the specific type of high-powered 15:13

24 laser diode bars as referenced in the Liu textbook 15:14

25 indicates that the ideal configuration for these 15:14

1           So I don't think there is a clear answer to       16:13  
2 your question.                                                   16:13

3           MR. KIM: Q. It wouldn't be a simple       16:13  
4 modification to just go from these two separate       16:13  
5 cavities and to put all 64 boards and diodes into a       16:13  
6 single cavity?                                           16:13

7           MR. JAFFE: Objection; form.                   16:14

8           THE WITNESS: Again, I don't -- with all of       16:14  
9 the complexity of engineering, I don't think you can       16:14  
10 make a broad brush statement that says, Oh, this would       16:14  
11 just be a simple thing to do.                           16:14

12           MR. KIM: Q. So GBr3 has [REDACTED]       [REDACTED]  
13 [REDACTED] correct?                                   16:15

14           A Yes, that's correct.                           16:15

15           Q And it has a single optical cavity?       16:15

16           A Yes, that's correct.                           16:15

17           Q And the [REDACTED] for GBr3,       16:15  
18 that's [REDACTED]                                   16:15

19           A That sounds correct. But I would prefer to       16:15  
20 look at a detailed specification to confirm that       16:15  
21 number.                                           16:16

22           Q All right.                                   16:16

23           I think you can go to the list of Trade       16:16  
24 Secrets and turn to -- let's see -- page 25.       16:16

25           A Okay. Nope, I don't need that anymore.       16:16

1 Sorry. 18:39

2 Well, I believe my original opinions were 18:39

3 reasonable based on the information then available. 18:40

4 The newly provided information requires me to withdraw 18:40

5 my opinion that the Fuji system infringes the 18:40

6 '922 patent and the '464 patents. 18:40

7 Q So your current opinion is that Fuji does not 18:40

8 infringe the '922 and the '464 patents; correct? 18:40

9 A That is correct. 18:40

10 Q And in your declaration, you said that you 18:40

11 reviewed all of the asserted patents in this case; 18:40

12 correct? 18:40

13 A In the original declaration? 18:40

14 Q Yes. 18:40

15 A Yes. 18:40

16 Q And so aside from the '944 and '922 patents, 18:40

17 is it your opinion that Fuji does not infringe any of 18:40

18 those asserted patents? 18:40

19 MR. BAYER: You said '944? 18:40

20 MR. KIM: Q. Aside from the '922 and the 18:41

21 '464, is it your opinion that Fuji does not infringe 18:41

22 any of the other asserted patents in this case? 18:41

23 MR. JAFFE: Objection; form. 18:41

24 THE WITNESS: Can I ask what other asserted 18:41

25 patents you're referencing? 18:41